

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN GRAY, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE  
PLANS ADMINISTRATIVE COMMITTEE OF  
CITIGROUP INC., THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No.: 1:07 Civ. 9790  
(SHS) (DCF)

ECF CASE

SHAUN ROSE, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE  
PLANS ADMINISTRATIVE COMMITTEE OF  
CITIGROUP, INC., THE 401(k) INVESTMENT  
COMMITTEE and JOHN DOES 1-10.

Defendants.

Civil Action No.: 1:07 Civ.  
10294 (DC) (GWG)

ECF CASE

MEREDITH TRANBERG, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP, INC., CHARLES PRINCE, THE  
PLANS ADMINISTRATIVE COMMITTEE OF  
CITIGROUP, INC., THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No.: 1:07 Civ.  
10341 (UA)

ECF CASE

ANTON K. RAPPOLD, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A., CHARLES  
PRINCE, THE PLANS ADMINISTRATION  
COMMITTEE OF CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and JOHN and JANE  
DOES 1-10,

Defendants.

Civil Action No.: 1:07 Civ.  
10396 (UA)

ECF CASE

SAMIER TADROS, on Behalf of All Others  
Similarly Situated,

Plaintiff,

-against-

CITIGROUP INC., CHARLES O. PRINCE, C.  
MICHAEL ARMSTRONG, ALAIN J.P. BELDA,  
GEORGE DAVID, KENNETH T. DERR, JOHN M.  
DEUTCH, ROBERTO HERNANDEZ RAMIREZ,  
ANN DIBBLE JORDAN, KLAUS KLEINFELD,  
ANDREW N. LIVERIS, ANNE MULCAHY,  
RICHARD D. PARSONS, JUDITH RODIN,  
ROBERT E. RUBIN, FRANKLIN A. THOMAS,  
JOHN DOES 1-20 (BEING CURRENT AND  
FORMER MEMBERS OF THE PLANS  
ADMINISTRATIVE COMMITTEE OF  
CITIGROUP INC.) and JOHN DOES 21-40 (BEING  
CURRENT AND FORMER MEMBERS OF THE  
INVESTMENT COMMITTEE OF THE  
CITIGROUP INC. 401 (K) PLAN),

Defendants.

Civil Action No.: 1:07 Civ.  
10442 (UA)

ECF CASE

STEPHAN FIORINO, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES  
PRINCE, THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and JOHN DOES 1-  
20,

Defendants.

Civil Action No.: 1:07 Civ.  
10458 (UA)

ECF CASE

JAMES BOLLA, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES  
PRINCE, THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and JOHN DOES 1-  
20,

Defendants.

Civil Action No.: 1:07 Civ.  
10461 (UA)

ECF CASE

MARK GEROULO, individually, on behalf of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR PUERTO RICO, and all others similarly situated,

Plaintiff,

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNÁNDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, SANDFORD I. WEILL,

Defendants.

Civil Action No.: 1:07 Civ.  
10472 (UA)

ECF CASE

**RESPONSE TO THE *GRAY AND TADROS* PLAINTIFFS' MOTION FOR  
(1) CONSOLIDATION, (2) APPOINTMENT OF LEAD PLAINTIFFS AND  
LEADERSHIP STRUCTURE, AND (3) ENTRY OF [PROPOSED] PRETRIAL  
ORDER NO. 1 ON BEHALF OF PLAINTIFF ANTON K. RAPPOLD**

Zwerling, Schachter & Zwerling LLP, counsel for plaintiff Anton K. Rappold in the above-caption action entitled *Anton K. Rappold v. Citigroup Inc., et al.* (Civil Action No. 07 Civ. 10396), hereby submits this response to the *Gray and Tadros* Plaintiffs' Motion for (1) Consolidation, (2) Appointment of Lead Plaintiffs and Leadership Structure, and (3) Entry of [Proposed] Pretrial Order No. 1 pending before the Court (the "Motion").

Plaintiff Anton K. Rappold does not oppose the Motion.

Dated: December 10, 2007

Respectfully Submitted,

**ZWERLING, SCHACHTER  
& ZWERLING, LLP**

/s/ Susan Salvetti

Susan Salvetti (SS 1508)  
Robert S. Schachter (RS 7243)  
Justin M. Tarshis (JT 9779)  
41 Madison Avenue  
New York, NY 10010  
Tel: (212) 223-3900  
Fax: (212) 371-5969

*Attorneys for Anton K. Rappold*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN GRAY, individually and on behalf of all  
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CITIGROUP INC., THE 401(k) INVESTMENT  
COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No.: 1:07 Civ. 9790  
(SHS) (DCF)

ECF CASE

SHAUN ROSE, Individually and On Behalf of All  
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COMMITTEE OF CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and JOHN and JANE  
DOES 1-10,

Defendants.

Civil Action No.: 1:07 Civ.  
10396 (UA)

ECF CASE

SAMIER TADROS, on Behalf of All Others  
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RICHARD D. PARSONS, JUDITH RODIN,  
ROBERT E. RUBIN, FRANKLIN A. THOMAS,  
JOHN DOES 1-20 (BEING CURRENT AND  
FORMER MEMBERS OF THE PLANS  
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Civil Action No.: 1:07 Civ.  
10442 (UA)

ECF CASE

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COMMITTEE OF CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and JOHN DOES 1-  
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Defendants.

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Civil Action No.: 1:07 Civ.  
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INVESTMENT COMMITTEE, and JOHN DOES 1-  
20,

Defendants.

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Civil Action No.: 1:07 Civ.  
10461 (UA)

ECF CASE



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Defendants.

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Civil Action No.: 1:07 Civ. 10472 (UA)

ECF CASE

### **CERTIFICATE OF SERVICE**

I, Susan Salvetti, hereby certify that on December 10, 2007 I caused to be electronically filed, true and correct copies of the foregoing documents:

- Response to the *Gray and Tadros* Plaintiffs' Motion for (1) Consolidation, (2) Appointment of Lead Plaintiffs and Leadership Structure, and (3) Entry of [Proposed] Pretrial Order No. 1 on Behalf of Plaintiff Anton K. Rappold, and
- this Certificate of Service

with the Clerk of the Court using the ECF system, which will electronically notify the following ECF participants in the above-captioned cases:

[rfinkel@wolfpopper.com](mailto:rfinkel@wolfpopper.com)  
[alencyk@wolfpopper.com](mailto:alencyk@wolfpopper.com)  
[mrosner@wolfpopper.com](mailto:mrosner@wolfpopper.com)  
[jkelly@wolfpopper.com](mailto:jkelly@wolfpopper.com)  
[ronen@sarrafgentile.com](mailto:ronen@sarrafgentile.com)  
[jmeltzer@sbclasslaw.com](mailto:jmeltzer@sbclasslaw.com)  
[jweeden@sbclasslaw.com](mailto:jweeden@sbclasslaw.com)

[eciolko@sbclasslaw.com](mailto:eciolko@sbclasslaw.com)  
[kmarrone@sbclasslaw.com](mailto:kmarrone@sbclasslaw.com)  
[kbornstein@sbclasslaw.com](mailto:kbornstein@sbclasslaw.com)  
[rhawood@hfesq.com](mailto:rhawood@hfesq.com)  
[srosen@hfesq.com](mailto:srosen@hfesq.com)  
[msilberstein@dealysilberstein.com](mailto:msilberstein@dealysilberstein.com)

I further certify that I have caused true and correct copies of the foregoing documents to be served by U.S. Mail to the following non-ECF participants:

Ann D. White, Esq.  
Ann D. White Law Offices, P.C.  
One Pitcairn Place, Suite 2400  
165 Township Line Road  
Jenkinstown, PA 19046

Mark K. Gyandoh, Esq.  
Joseph A. Weeden, Esq.  
Schiffrin & Barroway Topaz &  
Kessler, LLP  
280 King of Prussia Road  
Radnor, PA 19087

Jeffrey H. Squire, Esq.  
Brager, Wexler, Eigel &  
Morgenstern, P.C.  
885 Third Avenue, Suite 3040  
New York, NY 10022

Lionel Z. Glancy, Esq.  
Glancy, Binkow & Goldberg, LLP  
1801 Avenue of the Stars -Suite 311  
Los Angeles CA 90067

Howard G. Smith, Esq.  
Law Offices of Howard G. Smith  
3070 Bristol Pike, Suite 112  
Bensalem, PA 19020

Joseph Gentile, Esq.  
Sarraf Gentile LLP  
485 Seventh Ave., Suite 1005  
New York, NY 10018

Lawrence B. Pedowitz, Esq.  
George T. Conway, Esq.  
Wachtell, Lipton, Rosen & Katz  
51 West 52<sup>nd</sup> Street  
New York, NY 10019

Brad S. Karp, Esq.  
Susanna M. Buergel, Esq.  
Paul, Weiss, Rifkind, Wharton &  
Garrison LLP  
1285 Avenue of the Americas  
New York, NY 10019

Dated: December 10, 2007

/s/ Susan Salvetti  
Susan Salvetti (SS 1508)